

HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LANCE P. MCDERMOTT,

Plaintiff, *Pro Se*,

v.

U.S. POSTAL SERVICE (USPS), Postmaster
General, MEGAN BRENNAN, *Et Al.*;

and

GREATER SEATTLE AREA LOCAL (GSAL),
AMERICAN POSTAL WORKERS UNION
(APWU), AFL-CIO, PRESIDENT, MYRNA
UMALI; *Et Al.*, SALARIED UNION
OFFICIALS,

Defendants.

No. 16-cv-00377-JCC

**DECLARATION OF DANIEL
CAIRNS IN SUPPORT OF UNION
DEFENDANTS' MOTION TO
DISMISS**

I, Daniel Cairns, state as follows:

1. I am an attorney licensed to practice in the United States District Court for the Western District of Washington. I represent defendants Greater Seattle Area Local ("GSAL"), American Postal Workers Union ("APWU"), AFL-CIO, President Myrna Umali, and, Salaried

DECLARATION OF DANIEL CAIRNS IN
SUPPORT OF UNION DEFENDANTS'
MOTION TO DISMISS
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ROBBLEE DETWILER & BLACK
ATTORNEYS at LAW
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(206) 467-6700 · (206) 467-7589 facsimile

1 Union Officials (collectively "Union Defendants") in this matter. As such, I am familiar with the
2 files and records in this case.

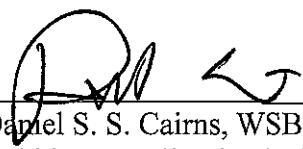
3 2. Attached to this declaration as Exhibit A is a true and correct copy of Plaintiff's
4 complaint (Dkt. #1), filed on June 30, 2015, in McDermott v. Brennan, 15-CV-01069-RAJ
5 (W.D. Wash.) ("2015 Action").

6 3. Attached to this declaration as Exhibit B is a true and correct copy of Plaintiff's
7 reply to the Union Defendants' motion to dismiss (Dkt. #11) in the 2015 Action.

8 4. Attached to this declaration as Exhibit C is a true and correct copy of the court's
9 order (Dkt. #21), dated February 23, 2016, granting Union Defendants' motion to dismiss in the
10 2015 Action.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed this 14th day of April, 2016, in Seattle, Washington.

13
14 
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25 DECLARATION OF DANIEL CAIRNS IN
SUPPORT OF UNION DEFENDANTS'
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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2016, I electronically filed the foregoing
DECLARATION OF DANIEL CAIRNS IN SUPPORT OF UNION DEFENDANTS'
MOTION TO DISMISS with the Clerk of the Court using the CM/ECF system which will send
notification of such filing to the following:

Lance McDermott
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E-mail: treke@hotmail.com

s/ Kristina Detwiler
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